

Personal Data Protection Policy

1. Introduction and Scope

Trieste Next Pty Ltd (trading as neXtrack), its subsidiaries and any other entity which may be acquired now or in the future (collectively referred to in this policy as “neXtrack”, “we”, “our” or “us”) considers the protection of your Personal Data a paramount corporate responsibility.

This Personal Data Protection Policy (“Policy”) describes the privacy practices of neXtrack’s websites, web applications, mobile applications (including our fleet management software) and desktop applications (“Products and/or Services”). This Policy sets out important information to assist you with a transparent understanding of the Personal Data we collect from you, why we collect it, how it is used and shared and your choices regarding the use of Personal Data we collect.

In order to provide our Products and/or Services to you, we need to collect, use and disclose to certain third parties’ information that may identify you personally. Simply put, all the information we collect is related to providing you with neXtrack Product and/or Services.

2. Consent

By utilising neXtrack Products and/or Services, you consent to the privacy practices described in this Policy. If you do not agree with any part of this Policy, please do not provide your Personal Data to us.

If you do not provide us with your Personal Data, or if you choose to exercise any of your rights in relation to this Policy including withdrawing consent that you have given under this Policy (in accordance with clause 11) then this may affect our ability to provide our Products and/or Services to you or it may negatively impact the Products and/or Services we can provide to you.

neXtrack operates across Australia and accordingly, we may disclose your Personal Data between our locations which may or may not be located in your area of residence. All neXtrack related entities are subject to the privacy practices set out in this Policy and any applicable jurisdictional legislation.

To the extent that it is relevant, for the purposes of the General Data Protection Regulations 2016/679 (“GDPR”) in the European Union neXtrack is both a “data controller” and a “data processor” of Personal Data you provide to us for the primary purposes of providing you with Products and/or Services.

3. What is Personal Data?

1. Personal Data

Personal Data is data which contains any information relating to:

- a. An identified or identifiable living person - an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name; or

- b. An identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We will only control and/or process Personal Data where the collection of Personal Data is necessary to deliver our Products and/or Services to you. Specifically, we only collect Personal Data under the following circumstances:

- c. As part of the provision of neXtrack Products and/or Services which includes, any Products and/or Services provided to any customer by neXtrack under an agreement;
- d. Any enquiry received by neXtrack directly from an individual through our website or as a result of an authorised marketing activity; and
- e. Any other data collection, processing or usage practice that neXtrack considers necessary as part of the ordinary course of providing the Products and/or Services or conducting their business.

2. Special Categories of Personal Data

Our Products and/or Services do not require us to collect ‘Special Categories’ of Personal Data from you. A Special Category of Personal Data is information which is of ‘sensitive nature’ such as information relating to:

- a. Race or ethnic origin;
- b. Health information including biometric or genetic information;
- c. Information relating to children;
- d. Philosophical, political or religious beliefs;
- e. Sexual preferences or practices; or
- f. Criminal convictions and records.

4. What type of Personal Data do we Collect?

We may collect the following types of Personal Data from you:

1. Information required to establish your customer account with us, such as:
 - a. Your name (or title);
 - b. Contact information such as your residential/mailling address, telephone or mobile number and email address;
 - c. Business and industry information such as your business name, the industry your business is in and the size of your business;
 - d. Financial billing information that we require to process payment for our Products and/or Services. For example, we may require financial information for the purposes of invoicing you for payment or to provide to third party payment processors if you have provided us with a direct debit authority.

Example: We may collect Personal Data such as your name, address, email or phone number so that we can provide you with a product

demonstration through our website or issue you with a product proposal.

2. Information collected to monitor how you interact with our Products and/or Services such as; device type, operating system information or network information. It also includes IP (internet protocol) addresses and regional settings.

5. What Personal Data do we Process?

We will always process Personal Data lawfully, fairly and in a transparent manner. Processing means any operation we perform on Personal Data that is considered collection, storage, transfer, dissemination or erasure of the Personal Data.

We will only process Personal Data, where:

- a. The action of processing is a result of your direct instruction;
- b. You have provided us with explicit consent to undertake the processing;
- c. The processing is necessary to provide our Products and/or Services to you; or
- d. The processing is necessary for us to comply with any legal obligations.

Example:

If you sign up to a neXtrack portal and enter a customer's personal contact details into a job, neXtrack will only use the Personal Data (contact details) you enter to store the Personal Data or to enable neXtrack portal to carry out the tasks you request it to do such as create an invoice or run a report. neXtrack will not control or use that Personal Data.

How do we use your Personal Data?

1. Primary Purposes

The primary purpose for which we control and process your Personal Data is to provide you with our Products and/or Services or to assist you with determining whether or not you would like to use our Products and/or Services.

This includes using your Personal Data for the following purposes:

- a. Preparing a proposal (quote document) for you or sending you a demonstration;
- b. Determining which or if any of our Products and/or Services are suitable for you;
- c. Establishing your account, account integration or providing you with the Products and/or Services you have elected to purchase;
- d. Notifying you of new features to our Products and/or Services or providing you with training;
- e. Performing internal operations necessary to provide our Products and/or Services to you such as troubleshooting software;
- f. Processing or facilitating payment for the Products and/or Services, including internal accounting or administration;

- g. Providing your Personal Data to our related entities for the purposes of administration, storage, advisory or technical services; and
- h. Any other purposes as authorised or required by law (e.g. to prevent a threat to health or safety, or to enforce our legal rights).

2. Secondary Purposes

We may also (upon obtaining your express permission) utilise your Personal Data for secondary purposes, such as:

- i. Evaluating your satisfaction and seeking feedback regarding our Products and/or Services; or
- ii. Sending you targeted marketing activities (including email mail outs or electronic marketing materials) in relation to events, our Products and/or Services.

On occasion we use customer's names, organisations and testimonials on our websites or on our social media. Your consent will always be obtained prior posting a testimonial.

3. Purposes Outside of Our Control

Any Personal Data that you choose to submit or post on our social media pages or any other public forum ("Forums") may be read, collected, or used by others who visit these Forums and may be used to send you unsolicited messages. We are not responsible for the Personal Data you choose to submit in these Forums.